

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LOWTECH STUDIOS, LLC,
Plaintiff,
v.
KOOAPPS LLC, JONATHAN CHANG, and
CHUN-KAI WANG,
Defendants.

KOOAPPS INC.,
Counterclaim-Plaintiff,
v.
LOWTECH STUDIOS, LLC and STEVEN
HOWSE,
Counterclaim-Defendants.

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING EXPERT DISCOVERY DEADLINES

Plaintiff and Counterclaim-Defendant Lowtech Studios, LLC, Counterclaim-Defendant Steven Howse, Defendant and Counterclaim-Plaintiff Kooapps Inc., and Defendants Jonathan Chang, and Chun-Kai Wang, by and through their respective counsel, hereby stipulate, subject to approval of the Court, that good cause exists to re-set and clarify the following deadlines regarding expert

discovery established by the April 22, 2024, Agreed Scheduling Order (Dkt. No. 27) and amended by a May 8, 2025 Amended Scheduling Order (Dkt. No. 105).

Deadline	Current Deadline	Proposed Deadline
Defendants' Reports (rebuttal)	June 9, 2025	June 26, 2025
Defendants' Reports (resisting claims and/or rebuttal)	June 26, 2025	June 26, 2025
Plaintiffs' Rebuttal Reports to Resisting Reports	July 11, 2025	July 24, 2025
Close of Expert discovery	July 18, 2025	August 28, 2025
Close of All Discovery	July 18, 2025	August 28, 2025
Dispositive Motions	August 5, 2025	September 18, 2025

Dated: June 2, 2025

Respectfully Submitted,

By: /s/ Russell E. Blythe

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Jonathan Chang and Chun-Kai Wang*

[PROPOSED] ORDER

Pursuant to stipulation, it is so ORDERED.

Dated: _____

United States District Judge

CERTIFICATE OF SERVICE

The undersigned certifies that on June 2, 2025, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system.

/s/ Eli B. Richlin

Eli B. Richlin